

**THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO**

SAM DOE 1, et al.,	)	
	)	Civil Complaint No. 2:13-cv-112
	)	
Plaintiffs,	)	
	)	JUDGE ALGENON L. MARBLEY
v.	)	
	)	
JACKSON CITY SCHOOL DISTRICT, et	)	
al.,	)	
	)	
	)	
Defendant.	)	
	)	

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**PROTECTIVE ORDER**

On motion of the plaintiffs and for good cause shown,

IT IS HEREBY ORDERED:

1. Plaintiffs herein shall be allowed to proceed in this cause with the use of pseudonyms Doe 1, Doe 2, and Doe 3, in place of their true identities. The parties shall utilize the pseudonyms for the plaintiffs in all pleadings, papers, hearings and in open court, and other statements and documents that are matters of public record.
2. Plaintiffs' counsel shall disclose the plaintiffs' identities and addresses to the defendants' attorneys but the plaintiffs and their counsel shall not be required to disclose the plaintiffs' identities to any other person.
3. Defendants' attorneys are permitted to disclose the plaintiffs' identities, addresses, or other information from which their identities can be discerned to other Jackson City Schools' attorneys, paralegals, legal assistants, and other support staff if: (i) such disclosure is necessary to allow counsel to fully and fairly represent the defendant, and

(ii) each Jackson City Schools' attorney, paralegal, assistant, or other support staff person to whom such disclosure is made, prior to the making of such disclosure, is given a copy of this order, reads it, and understands its content and that he or she is subject to it.

Defendants' counsel is otherwise forbidden from taking any action that discloses to any person, including Jackson City School Board members or other Jackson City officials, the plaintiffs' identities, addresses, or other information from which their identities can be discerned.

4. All court personnel (including court reporters and their staff or agents) who learn the plaintiffs' identities, addresses, or other information from which their identities can be discerned are hereby prohibited from taking any action that discloses to any person the plaintiffs' identities, addresses, or other information from which their identities can be discerned.
5. If the plaintiffs' identities, addresses, or other information from which plaintiffs' identities can be discerned are disclosed in any depositions transcripts, responses to interrogatories, or other discovery documents, the party providing such information must identify it as confidential by labeling any pages containing the plaintiffs' identities, addresses, or other information from which the plaintiffs' identities can be discerned with the word "CONFIDENTIAL" and binding those pages in a separate document labeled "CONFIDENTIAL."
6. Any pleadings or documents that disclose the plaintiffs' identities, addresses, or other information from which the plaintiffs' identities can be discerned shall not be publicly filed with the Court but may be filed with the Court only under seal, in envelopes marked

with the caption of this action and the words “DOCUMENT UNDER SEAL  
PURSUANT TO ORDER OF COURT.”

7. Plaintiffs shall not be required to be present in open court hearings of this cause. Any and all testimony to be presented by the plaintiffs may be presented by deposition testimony.
8. It is the intent of this order to preserve the anonymity of the individual plaintiffs to the greatest extent possible while affording the parties adequate information to effectively address the issues in this matter. Failure by any person to comply with the terms of this Order shall subject the violator to a finding of contempt of court, the penalty for which may include incarceration.

ENTERED on this day \_\_\_\_\_ of \_\_\_\_\_, 2013

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JUDGE